

July 2, 2004

TO: Paul Dabbs, DWR (sent as email attachment to [pdabbs@water.ca.gov](mailto:pdabbs@water.ca.gov))  
FROM: Steve Macaulay, Urban Caucus Chair  
SUBJECT: Urban Water Caucus Comments -- June 7, 2004 Advisory Committee Review  
Draft, Water Plan Update

The comments below represent those developed by participants in the Water Plan Advisory Committee's Urban Caucus. The Urban Caucus members are:

Alan Gribnau	Bill Jacoby	Fran Garland
Frances Spivey-Weber	Grace Chan	Kirk Brewer
Larry Rohlfes	Martha Davis	Mary Ann Dickinson
Steve Macaulay		

In addition, members may submit separate supplemental comments. Our comments are organized below by volume, chapter and page number. Some of our comments for the "Findings and Recommended Actions" were mentioned at the June 24 Advisory Committee meeting. We appreciate the opportunity to provide these comments.

## **Volume 1**

### **Findings and Recommended Actions**

1. General: It would be useful to have a clear, up-front discussion of the nature of this plan as compared to the more complete plan envisioned for 2008. In particular, it is worthwhile to discuss how the Plan has changed this time, and what people should expect. There also should be a clear message for the public and the Legislature up-front – the message we are sending, and what we want them to focus on in the near term.
2. Page 1, #2: Delete the word "other" preceding "household".
3. Page 2, #6c: It would be helpful to clarify environmental "requirements" and environmental "needs". It is not clear which the draft is intended to reference here.
4. Page 2, #6d: Insert "long-term" before "available water supply."
5. Page 2, #7: Insert "more" before "difficult" in the second sentence.
6. Page 3, #9: The discussion following the "current conditions" statement should reflect the long-term degradation of local water delivery systems.
7. Page 3, #11: The discussion says nothing about what this plan does.
8. Page 4, #13: The statement that current technical tools "are not capable of providing complete answers" is certainly true, but there will probably never be tools to provide complete answers. The discussion on Page 9 of Chapter 1 is more accurate, and the discussion on Page 4 should be revised accordingly.
9. Page 6, #1: This should also include the need to improve California's water conveyance/distribution infrastructure (note: this is not related to "Delta conveyance" which is a separate but important issue).
10. Page 6, #1: Add the concept of protecting and improving public health as a reason for or benefit of investing in water management. Modify the last part of the bold sentence to read " . . .to protect and improve public health and to maintain and improve California's economy, environment and standard of living."

11. Page 6, #2: The role of investor-owned utilities (IOUs) should be mentioned. Suggest adding “private utilities” to the lists in both the first and second sentences.
- 12.
13. Page 7, #5: The need to invest in aging distribution/delivery systems should be emphasized.
14. Page 7, #6: Reference is made to “the Governor’s water initiatives”. Since there are no such initiatives yet, perhaps this sentence should be revised.
15. Page 7, #7: We are not sure what “water quality matching” means. Also replace the phrase “deal with” in the bold sentence with something more specific and action oriented such as “remediate”. Revise the supporting text to read:

“The evaluation should include the effect of contaminants on public health, long-term sustainability of water resources and treatment costs and should identify and analyze alternative ways of preventing and remediating these effects. To safeguard water quality for all beneficial uses, the State should also develop and fund preventive programs that integrate source water protection, pollution prevention, matching water quality to use and water treatment.”
16. Page 7, #8: This is a good location to mention urban water management plans as an important data-gathering and evaluation tool. There is some good language in this regard in Chapter 5. This matter was discussed at the June 24 Advisory Committee meeting. You may consider adding a phrase that includes something about “...based on locally-developed urban water management plans.”
17. Page 8, #11: “DWR should...” needs to be revised to read, “DWR should continue to....”
18. Page 8, #12: Once again, there should be mention of how this may relate to IOUs and their planning processes. One approach is to add a sentence that says such assistance should include those communities served by private water utilities.
19. Pages 9-10: We separately suggest adding here (at the end of the “Findings and Recommended Actions”) or to Chapter 5 an implementation criteria matrix, putting all management tools and options through the same implementation “filter” so the reader can get a sense of the challenges of each tool. Finally, we suggest adding something more about implementation challenges in this portion of the report that captures at a high level the challenges of implementing the recommended actions. This might more appropriately be inserted following page 8.
20. Page 10: There was a great deal of discussion of the “Strategy Investment Options” table at the June 24 AC meeting, and the majority of the Advisory Committee suggested that the table be removed. If the table is retained, particularly with the dots, we would like the opportunity to provide further input regarding the water management objectives of each strategy. There should be a discussion about the appropriateness (or otherwise!) of putting costs per unit of water supply in this or any similar table, and we’d suggest some accompanying text on this subject since many people will simply divide the cost column by the water supply benefit column.

## **Chapter 1: Water Plan Overview**

1. Page 3, first bullet: The bullet starts off with “durable and achievable actions”. We would like to see a more complete discussion in Chapter 1 about how the Plan

addresses the concept of achievability. Readers need to get a sense for the size and difficulty of the tasks for each of the tools.

2. Page 5, second paragraph: The phrase “effectively reduced the water supply that can be used” should be followed by “or significantly increases treatment costs”. This will give a more complete picture of the problem.
3. Page 5, third paragraph: The statement “in other words, sustainable” is not properly used. The criteria that precede this statement do not fully describe what makes a water supply sustainable. Suggest deleting the referenced statement or add a complete list of criteria.
4. Page 6: This is another place where urban water management plans as an appropriate and valuable tool should be mentioned.
5. Page 8, discussion following first bullet: We are not sure what is meant by the phrase “faulty routine operation”.
6. Page 9, discussion following first bullet: The third sentence in the first paragraph is very similar to the first sentence in the following paragraph. Suggest editing as appropriate.
7. Page 9, last paragraph: The meaning or intent of the phrase “access State funding for water projects” is not clear – what would these funds be used for? Clarification is needed.
8. Page 12, Implementation Plan discussion: The phrase “implementation challenges” is used to refer to the contents of Chapter 5. We believe that such challenges may be understated for each of the management tools, and welcome a more thorough but brief discussion in Chapter 5. If this matter is not more thoroughly discussed in Chapter 5, we do not believe it is justified to use this description in Chapter 1.
9. Pages 5-10: Restructure this section according to the strategic planning elements—Vision, mission, goals and objectives/recommended actions. Key themes are redundant and should be eliminated. However, much of the information developed there can be used to elaborate on the objectives/recommended actions. Use consistent terminology throughout.

Vision: Add protecting and improving public health to the vision statement.

Mission: Add protecting and improving public health to the mission statement.

Goals: As written, these are all about process. There needs to be a goal about providing water to meet the diverse needs of the State—something like the first recommended action. Suggest modifying the fourth goal to do this.

Currently, the fourth goal is a consolidation of the state’s planning priorities as set forth in the Wiggins bill (AB857). The Wiggins bill does not require the planning priorities to be goals of every state plan, but requires goals of the plans to be consistent with the planning priorities. It also requires State agencies requesting funding for infrastructure projects to demonstrate that the infrastructure project is consistent with the planning priorities. Since the Water Plan is a strategic plan, this requirement does not apply. The Water Plan should have its own goals related to water management, water use efficiency and meeting future water needs—not land use planning. Explanation in the text would demonstrate how the goals are consistent with the planning priorities. Note that the purpose of the planning priorities is to

promote equity, strengthen the economy, protect the environment and promote public health and safety. All of these purposes are also important goals and objectives of the Water Plan.

Box 1-xxx Legal Requirements –Recently enacted Legislation AB857 (Wiggins): Should be revised per the discussion above.

## **Chapter 2: California Water Today**

1. Page 3, second paragraph: Delete the word “other” preceding “household uses”.
2. Page 3, last paragraph: The message is not clear. Should be revised to indicate WQ is another key water management issue and how it is being approached (more than just matching water quality to use).
3. Page 4: Miscellaneous edits are suggested in an attachment (PDF document showing underline/strikeout edits).
4. Page 4, bullets under General Adequacy of Water Supplies and Water Quality: Delete the last line of the third bullet and add a separate bullet on water quality and its importance to public health, treatment costs, operational decisions, etc.
5. Page 7, paragraph starting “The passage of SB 672...”: It is not clear how this relates to drought and dry year challenges. Suggest tying it in or moving it somewhere more appropriate.
6. Page 7, 4<sup>th</sup> bullet: It is not clear from what is presented how the advances in water conservation and recycling, combined with infrastructure improvements would alter the impacts of future droughts. Need to tie this in to the topic of the paragraph.
7. Page 11, South Coast Hydrologic Region:
  - a. Put in similar language about perchlorate and chromium as found in the Colorado River Hydrologic Region on p. 14.
  - b. Also add in concern about uranium tailings at Moab for both regions.
  - c. Not sure what the statement “local supplies face water quality problems associated with increased use of recycled water and marginal quality groundwater during droughts” means.
8. Page 16, Trend from Statewide Solutions to Regional Reliability: “Throughout California stakeholders are beginning to work together within regions and watersheds [suggest to add] and partnering with entities in other regions to develop programs....”
9. Page 16, Regional Water Management: “Conjunctive use of surface imported supplies and local groundwater basins” is another important regional water management that should be added to the list in the first paragraph.
10. Box 2-xx SB221, SB610 and AB901: The second paragraph should be rewritten so it is very clear what requirements are for all water supplies (the water supply assessment and the water quality info in UWMPs) and what changes relate only to groundwater. Some of the detail on the groundwater information should be deleted, so the focus is on the key issues such as proving rights to the water and addressing overdraft.

## Chapter 5: Implementation Plan

1. General: Even within the constraints this Plan must comply with, it needs to be more action-oriented. We believe this can be done without being project-specific to the point of requiring an EIR (one of the reasons we've been told the Plan cannot be too specific). This can be done by making the language more action-oriented, and to develop an up-front table or text box of "immediate steps to take" or "short-term deliverables". In general, this implementation chapter sounds too much like a work plan to develop a plan, rather than an action-oriented water plan that combines both planning and problem-solving engagement. The Urban Caucus would be glad to discuss this matter further, and several of our members are likely to help in this effort if DWR is willing to take this approach. We are mindful in the current planning environment that the Governor, the public, the stakeholders and the Legislature are looking for action – particularly with the large amount of bond funding available in recent years, and the pending allocation of funds from Proposition 50. Finally, much of this chapter looks to future DWR staff work, but staff resources are limited. To us this reinforces the need to focus on near-term activities.
2. General comments that apply to several "Recommended Actions":
  - a. Action plans are too vague; favorite words that have little meaning include "integrate information", "redirect existing resources and/or seek new...", "continue its participation and support". These items give the image that DWR staff will continually orchestrate or attend meetings or stay in the office writing; we not sure how all these will affect water supply reliability and quality.
  - b. Performance measures for many "Recommended Actions" include an item "measured improvements in .....objectives." What exactly is being measured to indicate improvements?
  - c. Recommended Action #5, #7, and #8 all involve DWR getting an inventory of something. While data is important, devoting resources to conduct surveys and build centralized databases is not a priority. If the Water Plan advocates regional planning, DWR's role should be to go out to the regions, talk to the local entities and assistant them to identified their data gaps and increasing the region's knowledge base.
3. Page 2, Recommended Action #1: The notion of addressing public education to affect public acceptance, conservation ethics, etc. is missing from both the action plan and implementation challenges.
4. Page 2, Intended Outcomes: Should include meeting future water needs.
5. Page 2, Action Plan: 5<sup>th</sup> bullet calls for redirecting resources and seeking new resources. Similar actions are called for on a number of the Recommended Actions. Committing to such an action begs the question of redirecting from what, implies a prioritization that we haven't addressed in this document and may not be possible given overall DWR responsibilities. Internal resources including staffing may need to be listed as a challenge instead of an action.
6. Page 3, Performance Measures: It is not clear what "Measured improvements in statewide water management objectives" means. This phrase, or a variation for regional, appears in many of the Recommended Actions and needs to be clarified in each case.

7. Page 3, Implementation Challenges: This is simply too “lightweight” to either be useful or capture some of the challenges being faced by those implementing the water management tools embodied in Recommended Action #1. We would be happy to provide suggested language or participate in a focused dialogue on this subject.
8. Page 4, Intended Outcome bullet #4: Need to emphasize that such guidelines and templates for the urban water management plans need to be developed by early 2005, since the 5-year urban water management plans are next due on December 31, 2005.
9. Page 4, Intended Outcome bullet #8: Any relationship between this intended outcome and the 2005 urban water management plans should be mentioned (the urban water management plans are required to include water shortage contingency plans). We note that the deadline for the “Critical Water Shortage Reduction Program” is December 2005, the same month the next urban water management plans are due.
10. Page 5, Resource Assumptions: The specific recommendation of 18 positions and \$8 million annually within DWR does not seem to line up with the general nature of the action plan of “developing work plan”, “provide assistance”, “improve coordination”; need to be more specific or give examples of what DWR actually does.
11. Page 6, bullet #6: the second sub-bullet (improve SWP fiscal management by December 2005) seems out of place and too general to convey meaning to readers. Perhaps the intended goal is to improve fiscal information reporting, with an expectation that this will lead to improved fiscal management? This suggestion would tie in better with the “Intended Outcomes” on Page 7.
12. Page 8, Recommended Action #4: Need to add specificity on actions and outcomes like those mentioned by Lester Snow in his address to the Advisory Committee on June 24.
13. Page 10, Recommended Action #5:
  - a. Action plan – How about value engineering for rehabilitation of SWP and loans or grant programs for local infrastructure?
  - b. Intended outcomes – The State having an inventory does not seem useful. It is likely more useful to implement a loan or grant program and projects will be identified and implemented.
  - c. Implementation challenges – For infrastructure it is probably not so difficult to “define the beneficiaries” or “define the scope of work”. The challenge is whether the project is affordable.
14. Page 10, Intended Outcome, bullet #3: The meaning of “PCCP pipelines”?
15. Page 12, first paragraph: As with an earlier comment, there are not yet any “Governor’s water initiatives”.
16. Page 12, Recommended Action #7:
  - a. Third bullet of Intended Outcomes should replace third bullet of Action Plan. Completing the feasibility studies and providing recommendation are the action.
  - b. Implementation Challenges – “defining the scope ...” is not the challenge, maybe having the agencies and other stakeholders agreeing on the interpretation of technical analyzing and recommendation is the challenge.

17. Page 13, Recommended Action #7: We strongly suggest that collaborative relationships specifically with the Department of Health Services, the State Water Resources Control Board and the Regional Boards be mentioned in the “Action Plan” and “Resource Assumptions”. There may be opportunities in this effort to help meet goals of these other State agencies as well.
18. Page 13 General: See previous comments on Recommended Action #7.
19. Page 13, Action Plan: The 3<sup>rd</sup> bullet sounds good, but how do you plan on doing this and to what standard? Is this part of another ongoing effort?
20. Page 14, Recommended Action #8: Before launching a major effort in data collection and building a large centralized database, take a look at what is already reported and decide how to utilize the data already there. Examples include urban water management plans, BMPs reports that urban water agencies submit to the California Urban Water Conservation Council, water quality reports to the Department of Health Services, etc.
21. Page 17, Resource Assumptions: “...the State would need to invest about \$10 million annually to commercialize promising water technologies.” This is a “cart before the horse” assumption. How does the State invest \$10 M a year on what technologies? If the State wants to get into this area, start small and establish something like MWDSC’s Innovative Conservation Program to provide grants to promising new technologies or the Innovative Supply Program to identify and provide grants to developers of new supplies. MWDSC’s ICP has a budget of \$250,000 every two years and the ISP is currently a one-time \$250,000.

## **Volume 2: Resource Management Strategies**

Introduction: The short discussion on page 1 is good regarding the “toolbox” analogy. One important aspect of implementing the strategies at the local level is integrating them operationally with the full “toolbox”. We think this merits some discussion – or at the least, mention the importance of fitting proposed strategies into the operational mix of current strategies.

Agricultural Lands Stewardship: (No Comments)

Agricultural Water Use Efficiency: (No Comments)

Conjunctive Management and Groundwater Storage: The “Groundwater Recharge” box and “Current Management” write-ups should include in-lieu replenishment as a recharge mechanism. This recharge method is widely practice and has the benefit of saving energy cost for pumping, avoiding limitation of spreading basins capacities, and not subject to weather conditions. On page 4, “Potential Costs”, add the phrase “availability of existing infrastructure to capture, covey, recharge, and extract water” to the second sentence. On page 4, “Lack of Data”, delete the last two sentences and replace with “It maybe expensive to conduct and collect adequate information to understand how the groundwater basin would respond to changes in storage and extraction operations.”

Conveyance: This section is very good. Suggest that on page 4, under the “Maintenance” discussion or elsewhere, there be mention of the problems with aging infrastructure that will require substantial reinvestment. Interestingly, this problem is mentioned in some

detail on page 2 of the “Drinking Water Treatment and Distribution” section (reference to ASCE study).

Desalination: In the “Major Issues” discussion beginning on page 5, there are two other issues with seawater desalination: (1) most water agencies distribution system is gravity flow from inland to ocean. It would be expensive to retrofit some portion of the system to reverse the flow; and (2) mixing of desalinated seawater and other water in the distribution system may have water quality issues e.g. “red water” from flushing deposits from pipe. Pure desalinated seawater may be too corrosive.

Drinking Water Treatment and Distribution: This section could benefit greatly from mentioning the “multi-barrier approach” as described in USEPA’s “Pocket Guide to Protecting Your Drinking Water” (particularly since it focuses explicitly on dealing with risk). We have attached a scanned copy of the relevant pages from that pocket guide. You might want to add the SFPUC to your description of agencies who have implemented new disinfection technologies, since they converted to chloramination in 2003. The sentence on page 2 immediately preceding “Potential Costs” mentions costs of two proposed regulations – it would be helpful to mention that this (presumably) is an estimate, and mention who developed the estimate. The reference to the ASCE report on deteriorating infrastructure is very good, and merits mention in Volume 1 – perhaps in a sidebar. The “Emerging Contaminants” discussion on page 3 could benefit from mention of some examples (just a simple list). The “Recommendations” beginning at the bottom of page 4 should mention something about the EPA-required annual consumer confidence reports/water quality reports.

Page 4, Recreation: body contact recreation can not only degrade but can make water supplies unusable for drinking water purposes.

Page 4, Public Distrust: purpose and meaning of last sentence is not clear. Kids choose soda over water because they don’t think the tap water is safe? Where is the evidence of such a statement? Suggest striking.

Page 5, #4: It is not clear what a “set aside capacity building” is, or why systems serving a lot of schools should get funding priority. The criteria are pretty comprehensive already and projects with public health benefits do get some priority.

#### Economic Incentives:

Page 1, second bullet: revise → “MWDSC’s water rates structure include charges a “water stewardship rate charge” ~~to all customers that applies to every acre-foot of water sold to collect revenue~~ to subsidize individual retail agency programs ~~with wider benefits that provide benefits to the region.~~”

Page 3, second paragraph: revise → “Similarly, a wholesale water agency might...to its ~~member agencies~~ retail water purveyors to encourage implementation...that would benefit ~~all member agencies~~ the region.”



Page 3, third paragraph: Message is not clear. It seems to be saying in the first sentence that the environment might benefit or be harmed depending on the volume, timing and location of water savings. Then, there could be a benefit to groundwater storage. Water quality benefits, that haven't been identified, might result in multiple benefits to others? Determine what is intended and rewrite.

Ecosystem Restoration: On page 3, first paragraph, revised the following sentence as indicated → "It may not be possible to fully mitigate for some of the impacts of these projects."

Floodplain Management: (No Comments)

Groundwater Remediation/Aquifer Remediation: (No Comments)

Matching Water Quality to Use: The paragraph beginning at the bottom of page 1 is another good opportunity to mention the "multi-barrier approach" and its relevance to the first sentence in that paragraph. The list of recommendations on page 5 should refer to the effort underway by the Central Valley Regional Board to develop a Central Valley Drinking Water Policy. This is a very active endeavor, directly involving a workgroup that includes a wide variety of stakeholders. We would be glad to provide more information if needed. It is an explicit recommendation in the "Pollution Prevention" section (page 6 of that section).

Also, suggest revising the sentence in the last paragraph at the bottom of page 1 → "For example, Metropolitan Water District of Southern California dilutes high salinity Colorado River water with lower salinity water from the Bay-Delta to enable groundwater recharge and water recycling – which in turn dilutes the higher bromide and organic carbon levels in Delta water with Colorado River water to comply with drinking water standards for disinfection by-products."

Other Resource Management Strategies: On page 6, "Current Transoceanic Water Bag Use in California", the title is inconsistent with first sentence, "Although this strategy is not currently being used..." It may be that the proposal cited has been withdrawn due to local opposition (based on recent press accounts) – this is worth confirming.

Pollution Prevention: This is another opportunity to mention the "multi-barrier approach".

Precipitation Enhancement: (No Comments)

Recharge Areas Protection: Revise the first paragraph on page 3 → "Additional benefits of recharging groundwater include some removal of microbial and chemical ~~degradation~~..." (Or some other way of stating the intent -- the word "degradation" is too technical and confuses the reader.)

Recycled Municipal Water:

Page 3, last bullet: “~~Lead to a~~ Advance the use of...”

Page 4, Potential Benefits, second paragraph: “Recycling in some areas may provide new water for the water agency, but not the state.” Disagree with this statement. If it is new water for some part of the state, it is a net gain. Even for the inland area, if the water is recycled once and then discharged (maybe a lesser amount) for downstream use, it would still save the inland agency from developing other supplies to meet demand. In other words, still a net gain.

Page 5, first paragraph: “Costs outside this range ~~may be~~ are plausible...” (Plausible is a “may be” already.)

Page 5, Major Issues: Add the need for disposal brine line, a major issue for inland agencies.

Page 5, Public Acceptance: Give examples of “indirect potable purposes” like replenishment of surface reservoirs or groundwater basins.

Surface Storage – CALFED:

Page 1, Current Status, first paragraph, second sentence: Replace “Sites” with “Locations” to prevent confusion with Sites Reservoir listed above.

Page 2, second paragraph, first sentence: Revise ➔ “...and Diamond Valley in the southern area of the state....” There is no “southern state” in California!

Page 3, Potential Benefits, third paragraph: Delete “A cumulative study will be part of the common assumptions effort.” (Most people would not know what this is.)

Surface Storage – Regional/Local: (No Comments)

System Reoperation:

Page 1, first paragraph: This includes the phrase “rebalance existing uses”, which we believe should be revised to read, “...rebalance existing and new supplies”.

Page 1, second sentence under “Current Extent of System Reoperation”: This mentions a shift to a “...risk based approach”. We recommend this be changed to “...more explicit and better-defined risk based approach”.

Page 2, third paragraph: revise ➔ “Many of these facilities...before the ~~modern~~ environmental laws...”

Page 3, first sentence: This lists multiple resource management strategies – “water conservation” would be a good addition to this list.

Urban Land Use Management: (No Comments)

Urban Runoff Management: (No Comments)

Urban Water Use Efficiency: This section is good, but could benefit from several additions. The first paragraph on page 2 mentions that a key benefit of improving water use efficiency is the ability to stretch existing water supplies. While conceptually that is true, the quantification of such savings can only be accomplished by evaluating how conservation savings are integrated operationally into the water supply system. For example, reduced water demands will free up water in normal and wet years, but it is critical to evaluate how that will benefit water supply reliability in such years when existing supplies are adequate to meet demands. This needs to be recognized as a case-by-case evaluation, depending on the water system involved, the level of demand, and the variations in water demands from one year to the next as well as throughout the year. We believe there needs to be recognition of the need to translate water conservation savings into specific water supply reliability benefits. On another matter, the second paragraph on page 2 should list savings in distribution system costs along with the other monetary savings resulting from urban water use efficiency. The “Major Issues” discussion seems to imply that funding is the major and most significant impediment to implementing urban water conservation programs (although “education and motivation” are also mentioned). We believe there is a need to include a recommendation for conducting additional research into the challenges of implementing the water conservation programs contained in the Urban Water Conservation MOU.

Page 4 “Demand Hardening” box: “However, consumers...” seems to imply that demand hardening does not exist. Same sentence, “...and this additional water savings from the drought response can be measured.” Measurement occurs indirectly after the fact, and it does not help water agencies meet demands during real-time. Suggest revising the sentence to read, “On the other hand, consumers will still respond behaviorally in drought times, and provide additional water savings.”

Page 5, Recommendation #4: Who would be doing these? What is DWR’s role if local agencies do this? Can DWR, or DWR with other entities, devise and administer programs toward those goals for economy of scale and charge a fee for smaller agencies that do not have staff to do these?

Water-Dependent Recreation:

Page 3, Major Issues: Potential impact of body-contact recreation on drinking water needs to be worked into this discussion, either under Impacts of Natural Resources or Water Quality. This is an important issue to many urban providers as drinking water regulations become increasingly stringent. The issue should be in this section as well as under the Drinking Water section.

Page 3, Water Quality: “Poor water quality can have a negative impact on water-dependent recreation.” How about the reverse? Water dependent recreation can

have a negative impact on water bodies, especially those use for drinking water. This paragraph only mentions sewage discharge from houseboats. How about body contact recreation introducing pathogens and boating and jet skies introducing MTBE and other petroleum products to the water?

Watershed Management: (No Comments)

Water Transfers: (No Comments)